



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TBM/SMF
F. #2021R00164

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 25, 2025

By ECF

The Honorable Joseph A. Marutollo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Shares of 21 East 61st Street Apartment Corp., et al.
Civil Docket No. 24-2147 (RPK) (JAM)

Dear Judge Marutollo:

The parties respectfully submit this letter pursuant to the Court's July 22, 2025 Order directing the parties to meet and confer to resolve the confidentiality designations raised in the parties' joint status report filed on July 21, 2025 at ECF No. 35. See Minute Entry dated July 22, 2025.

The parties have met and conferred concerning the confidentiality designations at issue. Following those discussions, the parties have agreed to defer seeking a ruling from the Court on the disputed designations at this time. Specifically, the parties agree that any request for judicial resolution of the confidentiality of the disputed materials may be made if and when the government seeks to use such materials in a public filing, or at such other time as either of the parties believe court intervention is necessary or appropriate.

The parties will promptly notify the Court if circumstances change or if judicial intervention becomes necessary.

Respectfully submitted,

JOSEPH NOCELLA, JR.
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By: /s/
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By: _____
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